

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

R.W., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:21-cv-02589-SEB-MJD
)	
UNITED STATES OF AMERICA)	
)	
Defendant.)	

DEFENDANT'S PRELIMINARY EXHIBIT LIST

Pursuant to the Case Management Plan entered on April 13, 2022 (Dkt. 23), defendant the United States of America hereby submits its preliminary list of exhibits that it presently believes it may use at trial of this case, exclusive of exhibits it may use solely for purposes of rebuttal or impeachment. Because discovery is ongoing, this list is tentative and subject to amendment pending further discovery.

1. The pleadings in this matter.
2. The administrative filings related to this matter.
3. The Indiana Officer's Standard Crash Report relating to the underlying traffic incident.
4. Materials relating to the United States Postal Service investigation of the collision, including PS Forms 1700 and 1769 and associated photographs.
5. R.W's medical records and medical bills relating to any injuries he allegedly sustained in the underlying traffic accident.
6. Records regarding any psychological or psychiatric care received by Ryan, Tia, or C.W. Workman before or after the vehicle accident underlying this case.
7. Any photographs, diagrams, or drawings of the area where the underlying traffic incident occurred.

8. All transcripts of, all exhibits to, and all documents referred to in any deposition taken in this action.
9. All exhibits to any of the pleadings in this action.
10. Any witness statements or other sworn statements relating to this matter.
11. All discovery responses that any party has served, or will serve in the future, in this action, including all exhibits to, and all documents referred to in, such responses.
12. All documents that any party has produced for inspection or as copies or produces in such manner in the future in this action.
13. All documents that the United States has requested, or requests in the future, from Plaintiffs, but that have not yet been produced, or have not been produced prior to trial.
14. All documents that non-parties have produced or produce in the future to any of the parties to this action.
15. All documents that are necessary to establish the United States' defenses.
16. To-be-created demonstrative exhibits.
17. All documents in Plaintiff's possession that relate to or concern the United States or the United States Postal Service.
18. All documents relied upon by any expert witness disclosed after the filing of this exhibit list.
19. All documents needed as foundation for expert testimony.
20. Any expert report disclosed in this matter.
21. All documents that the parties use in the future as exhibits in support of, or in opposition to, any motion for summary judgment.
22. All documents that the parties use in the future, as exhibits or otherwise, in any hearing, oral argument, or Court conference in this action.
23. All other exhibits listed or used by Plaintiffs.

If the United States discovers additional exhibits that it intends to offer into evidence at the trial of this case, its counsel will furnish identification of the additional exhibits to the Court and to opposing counsel.

Respectfully submitted,

ZACHARY A. MYERS
United States Attorney

By: /s/ Julian C. Wierenga
Julian C. Wierenga
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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